

**THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

MICHAEL ALLEN, et al.	)	
	)	
	)	
Plaintiffs,	)	
V.	)	Case No. 2:06-cv-879-WKW
	)	
UNITED STATES OF AMERICA	)	
	)	
Defendant.	)	

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WALLACE MONTGOMERY, et al.	)	
	)	
	)	
Plaintiffs,	)	
V.	)	Case No. 2:06-cv-880-WKW
	)	
UNITED STATES OF AMERICA,	)	
	)	
Defendant.	)	

**DEFENDANT UNITED STATES' EXHIBIT LIST**

COMES NOW, Defendant United States of America, by and through its undersigned counsel, and hereby submits this exhibit list pursuant to Federal Rule of Civil Procedure 26(a)(3) and this Court's December 21, 2006, order:

1. Left rear-mounted Cordovan Tire from Mrs. Bertha Moore's Mercury Mountaineer.
2. August 29, 2003, Alabama Uniform Traffic Accident Report-Version 1.
3. August 29, 2003, Alabama Uniform Traffic Accident Report-Version 2.
4. Photographs of Mrs. Moore's vehicle.
5. Photographs of a Lincoln Towncar driven by Michael Allen.

6. Curriculum Vitae/Biosketch of Ralph Cunningham.
7. July 19, 2007, expert report of Ralph Cunningham analyzing the Cordovan tire failure and likely cause of the August 29, 2003, accident involving Mrs. Moore, Michael, Lou Ellen, and Lori Allen, and Wallace and Phyllis Montgomery.
8. *The Rate of Deflation of Car Tyres*, R.J. Grogan and C.S. Murray for the Dunlop Co. Ltd.
9. Curriculum Vitae of Keith Weaver, M.D.
10. Dr. Keith Weaver's independent medical examination report for Michael Allen.
11. Dr. Keith Weaver's independent medical examination report for Lou Ellen Allen.
12. Dr. Keith Weaver's independent medical examination report for Lori Allen.
13. Dr. Keith Weaver's report on Michael Allen's post-accident treatment and medical expenses.
14. Dr. Keith Weaver's report on Lou Ellen Allen's post-accident treatment and medical expenses.
15. Dr. Keith Weaver's report on Lori Allen's post-accident treatment and medical expenses.
16. Medical records and billing charges of Dr. Leon H. Campbell, Jr.
17. Blue Cross/Blue Shield fee schedules for Alabama doctors.
18. Medicare fee schedules for Alabama doctors.
19. Any other applicable fee schedules for doctors practicing in Alabama.
20. Model of a human skeleton.
21. Model of the human spine.

22. Model of the human shoulder.

23. Model of the human knee.

24. *Atlas of Regional Anesthesia*, Second Edition, by David L. Brown (c) 1999.

25. *Neural Blockade in Clinical Anesthesia and Management of Pain*, Second Edition, edited by Michael J. Cousins and Phillip O. Bridenbaugh (c) 1988.

26. *Meniscal Tear as an Osteoarthritis Risk Factor in a Largely Non-Osteoarthritic Cohort: A Cross-Sectional Study*, C. Ding, G. Jones, *Journal of Rheumatology*, 2007;34:4, pp. 776-84.

27. X-Rays of Michael, Lou Ellen, and Lori Allen.

28. Blue Cross/Blue Shield list of number of suprascapular injections and intercostal nerve blocks performed by general internists in Alabama in the past two years.

29. Any and all reports generated by a physician (to be named later) chosen by the Defendant to conduct an independent medical examination of Wallace Montgomery.

30. Any and all exhibits necessary to complete the testimony, by deposition or otherwise, of a physician (to be named later), chosen by the Defendant to conduct an independent medical examination of Wallace Montgomery.

31. Any and all exhibits listed by Wallace and Phyllis Montgomery, either jointly or individually, on their exhibit list, including all listed depositions and deposition exhibit lists.

32. Any and all exhibits listed by Michael, Lou Ellen, or Lori Allen, either jointly or individually, on their exhibit list, including all listed deposition and deposition exhibit lists.

Defendant reserves the right to update this list by adding additional exhibits or deleting exhibits prior to trial.

Respectfully submitted this 16th day of January, 2008.

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**CERTIFICATE OF SERVICE**

I hereby certify that I have this date served a copy of the foregoing upon counsel for Plaintiffs by electronic filing, CM/ECF, and by mailing a copy of same, first-class, postage-prepaid, addressed:

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Dated this 16th day of January, 2008.

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